REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

New claims and claim amendments are presented herein to obviate the current rejection. No new matter has been added.

Specification

Those paragraphs of the specification containing embedded hyperlinks or browser executable code have been amended to delete such objectionable material as requested.

35 USC § 102

Claims 1-3, 9-10, 15, and 20-21 stand rejected under 35 USC § 102(e) as allegedly being anticipated by Kredo. These rejections are respectfully traversed.

Claim 1 recites generating a browsing request to a conversion server in response to said first user request if the content is not formatted in compliance with said voice-based protocol. Claim 1 also recites converting, by said conversion server, at least a first portion of said web page information into a file of converted information formatted in compliance with said voice-based protocol.

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Claim 9 recites a voice browser operating in accordance with a voice-based protocol, said voice browser receiving a first user request for content transmitted over a communication link and generating a browsing request in response to said first user request if the content is not formatted in compliance with said voice-based protocol. Claim 9 also recites a conversion server in communication with said voice browser, said conversion server including a conversion module for converting at least a first portion of said web page information into a file of converted information compliant with said voice-based protocol.

Claim 15 recites receiving a browsing request from said voice browser if said information is not formatted in compliance with said voice-based protocol. Claim 15 also recites converting said information into a file of converted information compliant with said voice-based protocol.

Claim 20 recites generating a browsing request to a conversion server in response to said first user request if the content is not formatted in compliance with said voice-based protocol. Claim 20 also recites converting, by said conversion server, said content into a file of converted information formatted in compliance with said voice-based protocol.

Kredo relates to an arrangement for facilitating instant messaging for a telephony user (see, inter alia, Figs. 9A-9c,

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claim 1). It does not relate to a multi-modal arrangement in which web pages that are not in a voice-based protocol may be converted into a voice-based protocol.

With Kredo, a telephony user initiates a login to the IM service by dialing a number and having the telephony user speak login information via an audio browser (see, inter alia, Kredo pars. 50-51). This login information is obtained by requesting a VoiceXML page configured to facilitate login (see, inter alia, Kredo par. 51). To confirm login, an IM web server sends a confirmation message to an IM proxy server which replies to an original web page request by sending a web page providing the login confirmation in a VoiceXML format to the audio browser (see, inter alia, Kredo par. 52).

In addition, Kredo also provides that a first telephony user may (via a mobile terminal) send an audio message directed to user B to the audio browser (see, inter alia, Kredo par. 57). The audio browser thereafter converts the audio message into a corresponding text message (see, inter alia, Kredo par. 57).

Kredo does not disclose (i) generating a browsing request to a conversion server in response to a first user request if content is not formatted in compliance with a voice-based protocol; and (ii) converting at least a first portion of web page information into a file of converted information formatted

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in compliance with the voice-based protocol, as defined in claims 1, 9, 15, and 20.

Rather, Kredo simply discloses translating audio browser generated IM messages into text messages (see, inter alia, Kredo par. 57). In addition, as voice-based protocol pages are made available to the audio browser in Kredo, there is no generation of browser requests to a conversion server which subsequently converts the content into a voice-based protocol as claimed.

In fact, ~~the only~~ conversion that takes place in Kredo is to convert an IM message generated with an audio browser into a text message. ~~This is not equivalent to~~ converting a web page into a voice-based protocol. *does not suggest the claimed*

Accordingly, claims 1, 9, 15, and 20 and their respective dependent claims should be allowable.

35 USC § 103

Claims 4-8, 11-14, 16-19, and 22-23 stand rejected under 35 USC § 102(e) as allegedly being unpatentable over Kredo in view of Giangarra. These rejections are respectfully traversed.

As Kredo fails to disclose those aspects described above, the skilled artisan would not have been motivated to combine the teachings of Kredo with Giangarra. Even if such references were

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combined, the references fail to teach or suggest all of the claim limitations.

Accordingly, claims 4-8, 11-14, 16-19, and 22-23 should be allowable.
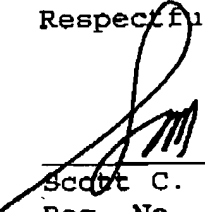

Concluding Comments

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant asks that all claims be allowed. Please apply any other charges or credits to deposit account 06-1050.

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Respectfully submitted,

Date: __3/16/05__

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